



City of Santa Barbara

Parks and Recreation Department

www.sbparksandrecreation.com

www.ci.santa-barbara.ca.us

February 7, 2007

Ms. Tracie Billington
Department of Water Resources
Division of Planning and Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

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Ms. Shahla Farahnak
State Water Resources Control Board
Division of Financial Assistance
1001 "I" Street, 16th Floor
Sacramento, CA 95814

Re: Integrated Regional Water Management Grant Program Guidelines

Dear Ms. Billington and Ms. Farahnak:

As a Cooperating Partner of the Santa Barbara Countywide Integrated Regional Water Management Plan (IRWMP), the City of Santa Barbara would like to submit the following comments of significant concern. Regarding the Department of Water Resources (DWR) and State Water Resources Control Board's (SWRCB) recent evaluation of funding additional Round 1 proposals using funds designated for Round 2 of the Proposition 50 Implementation Grants process, please consider the following comments:

- The County and City of Santa Barbara residents voted for Proposition 50 for the opportunity to access approximately \$200 million in planning and implementation grant funding as a South Coast competitor, in an open and fair process.
- To take away funding designated for Round 2 in order to satisfy special interests, while other regions are working diligently to apply for the second round of funding, is inequitable and biased.
- Moving funds to Step 2 Round 1 changes the terms of engagement mid-stream in the current Proposition 50 application process, forcing the City of Santa Barbara to compete with additional players (delineated for the Proposition 84 process), and for less money within a larger competitive area.
- What DWR and SWRCB is proposing would limit the City of Santa Barbara to only being eligible to apply for Prop 84 grant funds and compete for these funds with agencies that have already received funding from Prop 50.

Secondly, in regards to the State's consideration of altering grant program guidelines, mid-stream in a two-round process, please take into account the following concerns:

- The investment(s) made to satisfy the existing guidelines for Proposition 50 cannot be ignored. The Cooperating Partners of the Santa Barbara Countywide IRWMP have, to date, collectively invested more than \$250,000 to produce an IRWMP, and that effort has demanded significant staff time of approximately 40 people from 29 different agencies within the County, over the past nine months.



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- In addition, the boards and councils of these 29 agencies have reviewed and adopted a Memorandum of Understanding to coordinate under the current Prop 50 guidelines.
- The demanding coordination effort made by the 29 participating agencies within Santa Barbara County in order to produce an IRWMP and integrate our projects is unprecedented. If this effort results only in a loss of opportunity due to a change in the rules, it is likely that we, as a region, may not accomplish this level of coordination again in the near future.
- The City of Santa Barbara has several well-regarded and valued local projects that are highly qualified for Proposition 50 grant funding. For example, the Lower Mission Creek Flood Control and Restoration Project satisfies multiple state and regional objectives, provides numerous benefits to both the city and the region, and is ready to proceed. However, this multi-faceted project, which epitomizes the integrated water planning effort that is the goal of Proposition 50, is put at risk by limiting access to funding for which it is our right to compete.
- We recognize that there is no guarantee that IRWMP efforts will result in successful implementation grant funding. However, it is only fair to ask participants to accept that risk if there is an open and competitive process. There is no fairness in the State's proposal to remove the open competition for Round 2 funding and move it to a revised and limited process when there are regions currently working in good faith to compete for it.

The City of Santa Barbara, therefore, strongly urges DWR and the SWRCB to maintain the Proposition 50 Chapter 8 Round 2 funding process, as is. At the very least, any/all funds remaining after additional proposed awards are allotted should be strictly reserved for the agencies/regions that have been preparing IRWM Plans for Round 2 funding.

Sincerely,

Jill Zachary
Creeks Manager

Steve Mack
Water Resources Manager

cc:

Lester Snow
Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

Santa Barbara Countywide IRWMP Cooperating Partners:

Cachuma Conservation and Release Board



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Cachuma Operation and Maintenance Board

Carpinteria Sanitary District

Carpinteria Valley Water District

Casmalia Community Services District (CSD)

Goleta Sanitary District

Goleta Water District

Goleta West Sanitary District

La Cumbre Mutual Water Company

Los Alamos CSD

Mission Hills CSD

Central Coast Water Authority

City of Buellton

City of Carpinteria

City of Guadalupe

City of Lompoc

City of Santa Barbara

City of Santa Maria

City of Solvang

Cuyama CSD

Golden State Water Company

Montecito Sanitary District

Montecito Water District

Santa Barbara County

Santa Maria Valley Water Conservation District (WCD)

Santa Ynez River WCD

Santa Ynez River WCD Improvement District (ID) #1

Summerland Sanitary District

Vandenberg Village CSD